

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:) Case No. 25-30004
)
THE RUINS, LLC) Chapter 11
)
Debtor)
)

**NOTICE OF MOTION TO EQUITABLY SUBORDINATE
CLAIM OF RED RIVER STATE BANK TO THOSE OF ALL
OTHER CREDITORS EXCEPTING INSIDERS OR, IN THE
ALTERNATIVE, FOR ENTRY OF AN ORDER DIRECTING
RED RIVER STATE BANK TO SHOW CAUSE WHY IT
OUGHT NOT BE HELD IN CONTEMPT OF COURT**

NOTICE IS HEREBY GIVEN that the above-referenced debtor has filed motion to equitably subordinate the claim of Red River State Bank (“RRSB”) to those of all non-insider creditors or, in the alternative, for entry of an order directing RRSB to show why it ought not be held in contempt of court. A copy of the motion is being filed with this notice.

NOTICE IS FURTHER GIVEN that written objections to the motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court for the District of North Dakota, 655 1st Ave. N. Suite 210, Fargo, ND 58102-4932 within fourteen (14) days from the date of the service of this notice. Any objections not filed and served may be deemed waived.

[Signature on Following Page]

Respectfully Submitted,

Dated: November 19, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of November, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig